

22-MJ-4146-DHH

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Matthew A. Keating, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) since October 2005. I am currently assigned to the FBI Boston Division, where I investigate Violent Crimes Against Children (“VCAC”) and Human Trafficking. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I currently investigate crimes against children and human trafficking, including the sexual exploitation of children; trafficking of adults and minors; coercion and enticement of minors online, as well as other violations of federal law. Prior to this assignment, I served in the Washington Field Office, investigating foreign counterintelligence matters, including criminal espionage investigations. After that, I worked in the New Orleans Division, investigating counterterrorism matters, as well as working on the criminal investigation of the Deepwater Horizon oil spill in the Gulf of Mexico. I also have worked as a Supervisory Special Agent at FBI Headquarters in Washington, D.C. investigating insider threats against the U.S government and specifically the FBI.

2. I make this affidavit in support of a criminal complaint charging Angelo Dominic LOMBARDO (hereinafter the “SUBJECT”), YOB 1995, with two counts of Title 18, United States Code, Section 1591(a)(1) (sex trafficking by force, fraud, or coercion) and one count of Title 18, United States Code, Section 922(g) (felon in possession of a firearm and ammunition).

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3. The statements in this affidavit are based on my own personal involvement in the investigation and my personal observations; information provided by other FBI Special Agents, FBI analysts, local police officers, and task force officers; information obtained from other individual(s); my review of records; and my training, and background as a Special Agent with the FBI. This affidavit is intended to show merely that there is probable cause to secure a criminal complaint and does not set forth all of my knowledge about this matter. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

PROBABLE CAUSE

Interviews of Victim #1

4. On July 10, 2021, a uniformed officer of the Boston Police Department (“BPD”) responded to a radio call in East Boston and met Victim #1 and Victim #1’s mother.¹ In this initial interview, Victim #1 reported the following: she was being “pimped out” by Angelo Dominique-Lombard.² Victim #1 and the SUBJECT flew on July 3, 2021, from Portland, Oregon, to Boston so that she could engage in commercial sex. The SUBJECT set up meeting spots throughout the city for Victim #1 and her customers, where she was paid for commercial sex. She did not feel like she was being kidnapped but feared that the SUBJECT would retaliate if he knew that she was

¹ I know the identity of Victim #1, who was interviewed several times, as outlined herein. I omit her name because she is the victim of sex trafficking to protect her privacy and for the sake of her safety.

² The original police report listed this name. I believe that the reporting officer got the name wrong, and that Victim #1 was referring to the SUBJECT, Angelo Dominic Lombardo, whose photograph she later identified and who she referred to as Angelo Lombardo in other interviews.

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speaking to police. The SUBJECT also had rooms at the Avid Hotel in Revere, where he housed the women who worked for him, and Victim #1 stayed in Room 337 with another woman.³

5. Later that day, detectives from the BPD Human Trafficking Unit interviewed Victim #1 and her mother.⁴ During the interview, Victim #1 advised that she first met Angelo Lombardo (the SUBJECT) in Portland, Oregon.⁵ The SUBJECT told her that she would have a better life, have money and not worry about anything, and promised her financial stability and more. The SUBJECT arranged a photo shoot for her, where she was photographed by an unknown individual clothed, partially clothed, and completely nude. Some of the photographs that were taken of her during the photo shoot to post advertisements of her on websites including Tryst, Mega Personals, Seeking Arrangements, Eros, and Snapchat.⁶ The SUBJECT, while she was still learning, and Victim #1 arranged dates through TextNow; Victim #1 would have sex with the dates, get paid, and leave.⁷ The SUBJECT set the pricing of Victim #1's dates: \$400 per hour, \$650 for two, and \$2,000 for an overnight. She was paid with cash or via CashApp. Ultimately,

³ In fact, law enforcement later interviewed Victim #2 in Room 337 of the Avid Hotel in Revere. I know the identity of Victim #2, who was interviewed several times, as outlined herein. I omit her name because she is the victim of sex trafficking to protect her privacy and for the sake of her safety.

⁴ The mother of Victim #1, who was 18 years old at the time, was present during the interview. The interview was recorded and transcribed and I have read a transcript of that interview.

⁵ Victim #1 identified the SUBJECT from a single photograph, from his state of Florida driver's license. She also described him as Italian, 26, and 5'10" to 6'0" and from Florida, which is an accurate description of the SUBJECT.

⁶ I am aware that, with the exception of Snapchat, which I believe was likely used to set up individual dates, these are all websites that advertise commercial sex.

⁷ I know that "dates" is a common reference to commercial sex.

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the proceeds would go to the SUBJECT, who gave her money if she needed it for things like food. Victim #1 reported that she was working for the SUBJECT in Oregon for approximately two and a half weeks before arriving in Massachusetts. Victim #1 stated that she went on at least ten dates in Oregon and made close to \$5,000, all of which went to the SUBJECT.

6. Victim #1 also stated that the SUBJECT decided that they were going to travel to Boston for the purpose of making money because Boston had less restrictions and the SUBJECT had been here before and knew how to make money. In early July, the SUBJECT, Victim #1, and Victim #2⁸ flew to Boston on JetBlue using tickets that Victim #1 purchased. The SUBJECT shipped his car, a black Cadillac, from Oregon. Victim #1 continued to engage in commercial sex in the Boston area, set up through TextNow and Snapchat. Victim #1 performed approximately four or five dates and made approximately \$1,500, which went to the SUBJECT.

7. Victim #1 also stated that Victim #1 and Victim #2 stayed together in several different hotels in the Boston area, including the Aloft in the Seaport. The SUBJECT also had a partner, whom Victim #1 named as “Poncho,” who arrived a few days later with his own girl. She described Poncho as skinny white kid with long hair, early twenties, and face tattoos.⁹

8. During additional interviews with law enforcement, Victim #1 further reported that she was sexually involved with the SUBJECT. Victim #1 stated she was very familiar with the SUBJECT and over the prior month and a half had seen the SUBJECT at least once per day.

⁸ Victim #1 identified Victim #2 by first and last name.

⁹ Law enforcement interviewed a person who answered to “Poncho” and described himself as a “bro” of the SUBJECT.

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9. Victim #1 stated to the investigators that the SUBJECT was in possession of a “very powerful drug” that she described as similar to the color and substance of Cocaine. Victim #1 stated that the SUBJECT would often have one of the “hoes,” referring to herself and Victim #2, hold the drugs in their bags.

10. Victim #1 further stated that she observed the SUBJECT possess a firearm. She had not seen the gun since arriving in Boston, but the SUBJECT told her that he was having it shipped to Boston inside of his car. The SUBJECT said he could not be in Boston without any protection. Victim #1 described the firearm as black with a long thing that holds bullets attached to the bottom of it.

The SUBJECT’s Arrest

11. On July 12, 2021, law enforcement observed the SUBJECT leaving the Hampton Inn in Revere, Massachusetts, with another female (hereinafter referred to as “Female #1”) and entering a black Cadillac. Law enforcement subsequently conducted a traffic stop of a black Cadillac and placed the SUBJECT under arrest. The SUBJECT was charged by the Commonwealth of Massachusetts with Trafficking of a Person for Sexual Servitude and Deriving Support from Prostitution. At the time of the traffic stop, the SUBJECT was with Female #1. At the time of his arrest, the SUBJECT had approximately \$3,310 in United States currency in his possession.

Interviews of Victim #2

12. On July 12, 2021, law enforcement located Victim #2 at the Avid Hotel in Revere, at which time Victim #2 was interviewed. Victim #2 stated that she met the SUBJECT a few

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months ago in Oregon.¹⁰ She needed a place to stay, and the SUBJECT provided a hotel room for her to stay for a few days. Victim #2 stated that while she was in the hotel, she would have sex for a fee. The SUBJECT posted her on sites such as MegaPersonals, Adult Church, and Private Delights.¹¹ The SUBJECT set up dates for her and she would wait for a knock at the door and would have sex for money.¹²

13. Victim #2 also stated the following: she had travelled to Boston from Oregon approximately two weeks prior via a Jet Blue flight, paid for by the SUBJECT, along with Victim #1.¹³ After arriving in the Boston, Victim #1 and Victim #2 went on dates in the area, set up by the SUBJECT. Victim #2 made a thousand dollars for three hours and kept three hundred dollars, with the rest going to the SUBJECT. The SUBJECT set up the dates and posted Victim #2 on her phone. The SUBJECT or another person¹⁴ would drive Victim #2 to the dates in his car, which was a 2019 black Cadillac car, or sometimes she would have to take an Uber. They stayed at the Aloft in Boston and Avid Hotel in Revere. Victim #2 described Angelo's car as a 2019 black Cadillac. Victim #2 stated that she had observed the SUBJECT with Percocet pills, Molly and

¹⁰ She described the SUBJECT as Italian, well fit and 5'7" or 5'6".

¹¹ These are some of the same sites described by Victim #1.

¹² Victim #2 said that she was high or intoxicated or both during the dates because she did not want to remember them. Based on my training and experience, as well as the external corroboration and consistency with Victim #1's account, I believe that she is telling the truth. I have also reviewed the transcripts of recordings of interviews with Victim #2.

¹³ Victim #2 identified Victim #1 by name. Victim #1 said that she paid for the flights; I believe that the discrepancy may be that the SUBJECT provided the money used to purchase the flights.

¹⁴ Victim #2 identified Female #1 by her first name and described her. As previously mentioned, this female was present with the SUBJECT when he was arrested and identified the SUBJECT as her boyfriend.

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Cocaine, and that he would sell the drugs as party favors. The SUBJECT had a partner, Poncho, who was described as skinny with long black, braided hair and face tattoos.

14. Victim #2 also said that she felt like a hostage. She said that the SUBJECT got mad at her if she walked out the door or went to smoke a cigarette; would verbally cut her down; and would swear at her, call her a dirty hoe, and tell her that she was better off dead.¹⁵ Victim #2 also said that the SUBJECT would get mad if she spoke to guys other than the “tricks.”¹⁶ The SUBJECT yelled at Victim #2 and put her down, took away her confidence, and made her feel less of a person. Victim #2 was also told that the SUBJECT had hit other people, including women.

15. Victim #2 further advised that the SUBJECT had access to a firearm and believed that it was either in his hotel room at the Hampton Inn in Revere, or in his Cadillac. She stated that the last time she saw the firearm was the night before (July 11, 2021) in the SUBJECT’s vehicle when the SUBJECT drove Victim #2 to a date in Boston.

16. On or about July 14, 2021, Victim #2 advised law enforcement that the SUBJECT had threatened her with a firearm while they were in Oregon. Victim #2 stated she was supposed to make \$2,000 for the SUBJECT, but only returned home with \$500. The SUBJECT put a gun to her head and made her go back out to make the full \$2,000. Victim #2 further advised that the SUBJECT would not let her leave and told her that he knew her mother and threatened to kill her mother.

¹⁵ In my training and experience, I believe that the SUBJECT was psychologically manipulating Victim #2 to cause her to continue to engage in commercial sex.

¹⁶ I know, based on my training and experience, that “tricks” is another term for “dates” or commercial sex clients.

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17. Victim #2 also provided investigators with a video of her holding a black firearm with an extended magazine and red laser sight. Victim #2 stated that the video was taken a few weeks ago in Oregon, but that the gun in the video was the same gun she saw in the SUBJECT's vehicle in Massachusetts.

Search of SUBJECT's Hotel Room

18. On July 15, 2021, investigators executed a search warrant issued by an Associate Justice of the Massachusetts Superior Court, of room #511 at the Hampton Inn in Revere, Massachusetts. This room was registered to Female #1. A black Taurus 9MM pistol, with a laser attached and a loaded large capacity magazine, was found. The large capacity magazine contained 20 live rounds of ammunition.

19. I am aware that the SUBJECT pled guilty to possession of fentanyl with intent to deliver or sell and possession of over twenty grams of marijuana in Broward County, Florida, and was sentenced to a term of 36 months imprisonment. Case No. 13-16463.

20. I am aware that Taurus firearms are not manufactured in the State of Massachusetts. I am also aware that commercial ammunition is not manufactured in the State of Massachusetts. Additionally, based upon my review of the firearm that was recovered on July 15, 2021, and the description of the firearm provided by Victim #1 and Victim #2, I believe that the firearm is the same firearm that Victim #2 reported seeing on the SUBJECT in Oregon and then again in Massachusetts on July 11, 2021. As a result, I believe that the firearm and ammunition traveled in interstate commerce.

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CONCLUSION

21. I believe that the SUBJECT engaged in sex trafficking by force, threats of force, fraud, and coercion or any combination thereof. Specifically, he engaged in fraud by making false promises of a better life to both victims; he coerced both victims psychologically; and made explicit threats to Victim #2, including by gun.

22. Based on the foregoing, I submit there is probable cause to believe that:

- a. Between on or about July 3, 2021 through July 10, 2021, LOMBARDO committed sex trafficking of Victim #1 by force, threats of force, fraud, coercion, or any combination of such means, to cause Victim #1 to engage in commercial sex acts, in violation of Title 18, United States Code, Section 1591(a)(1);
- b. Between on or about July 3, 2021, and July 12, 2021, LOMBARDO committed sex trafficking of Victim #2 by force, threats of force, fraud, coercion, or any combination of such means, to cause Victim #2 to engage in commercial sex acts, in violation of Title 18, United States Code, Section 1591(a)(1); and
- c. On or about July 11, 2022, LOMBARDO, knowing that he was previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting

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interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

Matthew A. Keating / 38/2

Special Agent Matthew A. Keating
Federal Bureau of Investigation

Sworn before me by telephone in accordance with Fed. R. Crim. P. 4.1 this 28th day of April, 2022. 2:49 p.m.

